



TAND & ASSOCIATES

Attorneys at Law

Via ECF

Honorable Robert M. Levy, U.S.M.J.
United States District Court
Eastern District, New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Saeteros Campovede v. Alex Figliolia Water & Sewer
LLC, et. al.
15-cv-07353 (ENV)(RML)**

Honorable Sir:

As you are aware the undersigned represents the Defendants on the instant matter. As per Your Honor's request, the undersigned looked into the different ways that the settlement agreement was given to Alex Figliolia to sign. The undersigned, as usual protocol presented the agreement to the company's accountant who is the primary contact for the company. She, in turn, first presented it to the office manager who presented it to Mr. Alex Figliolia. Mr. Figliolia has been unable to be reached however due to his own health issues and the recent passing of his wife. The office manager has tried repeatedly to get Mr. Figliolia to sign the agreement but has been unable to obtain his signature. The undersigned proposes however, if it is acceptable to the court, that the current owner of the company, John Figliolia be permitted to sign the agreement in Alex. Figliolia's stead. Defendants are prepared to continue making payments as per the agreement and should the court deem John Figliolia acceptable, the settlement can proceed as originally planned.

/s/

Jonathan A. Tand